



# Department of Toxic Substances Control



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April 4, 2003

## NOTICE OF EXEMPTION

**To:** Office of Planning and Research  
P.O. Box 3044  
Sacramento, CA 95812-3044

**From:** Land Disposal Branch  
8800 Cal Center Drive  
Sacramento, California 95826

**Project Title:** Post-Closure Permit for IT Panoche Hazardous Waste Management Facility,

**Project Location:** Solano County      **Specific:** Lake Herman Road  
**City:** Unincorporated      **County:** Solano

**Project Description:** The project is the issuance of a post-closure permit for the Hazardous Waste Management Facility (HWMF) at the IT Panoche Facility. IT Panoche stopped receiving hazardous waste in 1987 and the facility completed closure in 2000. The Closure Plan was approved by the Department of Toxic Substances Control (DTSC) with waste remaining in place in compliance with the Closure Plan. The Closure Plan required the items listed under that heading below to be implemented in order to properly close the facility. With closure certification, state and federal regulations require that a post-closure plan for a 30-year period be developed and implemented by the facility.

The post-closure permit outlines the procedures to fulfill these regulatory requirements, which consist of three primary functions: (1) Maintenance and operation of closure structures and treatment systems, (2) environmental monitoring, and (3) maintenance of financial mechanisms to fund the post-closure activities. The post-closure activities required to be implemented with the issuances of the post-closure permit are listed under that heading below.

### BACKGROUND

The IT Panoche facility is a class I disposal site that occupies approximately 242 acres and received wastes between 1968 and 1986. During operation, the Panoche facility received 80,000 to 200,000 tons of waste per year including caustic and acidic liquids and solids, petroleum refining sludges, catalysts, inorganic and organic sludges. Waste management practices included biological treatment, neutralization, evaporation in ponds and burial of waste into landfills and trenches. Commencing in 1984, IT implemented a number of major construction projects to address new regulatory requirements for surface impoundments. From 1984

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to 1991, all site surface impoundments were solidified and covered. Only lined units for management of recovered groundwater were retained. Above-ground lined tanks were constructed to manage liquids removed from the landfill leachate collection systems.

In November 1988, IT submitted its Closure and Post-Closure Plans for the IT Panoche facility to the Department of Health Services (predecessor to DTSC). After numerous revisions, a great deal of public input, and completion of a comprehensive Environmental Impact Report (EIR), the Closure Plan was approved by DTSC on March 16, 1998. The most substantial of the closure revisions were to address County Requirements for consideration of a closure which included relocation of any waste materials within 200 feet of the facility boundary. The plan approved by DTSC was in part made viable by new regulations for Corrective Action Management Units (CAMU), which allowed for waste relocations and for a system of tanks and lined impoundments for long-term water management and groundwater cleanup, and a small landfill area for long-term solids management. IT completed closure construction activities specified in the Closure Plan in the fall of 2000.

One area of the site is not a part of the closure plan or its completion certification. Drum Burial Area V and releases from it have been handled under Corrective Action Consent Agreements since 1993, prior to the closure plan approval. While parts of the remedy have been operating since 1997, ongoing corrective action construction continues for this area pursuant to a corrective action remedy selection Consent agreement issued in 2000. Reference is made in the permit to this corrective action as the mechanism for remediating releases from this Solid Waste Management Unit.

## **CLOSURE PLAN**

In compliance with the Closure Plan and the Environmental Impact Report (EIR) for the IT Panoche, the following activities were implemented:

1. Removal and relocation of waste materials and contaminated subsoils from certain waste management units (WMU) and four on-site drum burial areas (DBA) around the permitted site boundary to the central drainage area of the facility,
2. Development of "borrow areas" for obtaining clean native soils to be used in the construction of the final closure covers,
3. Placement of the final closure covers over all areas where waste materials are or were previously located (approximately 110 acres),
4. Construction of surface water drainage ditches and erosion control measures, and
5. Management of groundwater by containment and removal, and using onsite tanks, surface impoundments and solar evaporators.

The three year construction project for closure of the IT Panoche landfill was completed during 2000. As-Built documents were submitted to DTSC in February of 2001, and approved in September 2001. The as-built design and several additional technical reports on long-term monitoring and maintenance were used by DTSC to prepare a post-closure permit for the facility. Throughout the closure process, IT has continued to maintain financial assurances to guarantee that funding would be available to complete the project. Additional funding mechanisms are also in place to provide for the long-term post-closure maintenance and monitoring of the site.

## **POST-CLOSURE PERMIT**

To ensure that all of the required post-closure activities occur during the 30-year post-closure period, DTSC required the submittal of post-closure permit application by IT. DTSC drafted postclosure permit conditions indicating the post-closure activities required to be implemented. These post-closure activities described in the post-closure permit include:

- 1) Monitoring groundwater elevation and water quality at the facility,
- 2) Managing leachate and contaminated groundwater by extracting and treatment,
- 3) Managing landfill gas and solvent vapors by collecting, treating and venting it,
- 4) Monitoring the groundwater contamination near the slurry wall downgradient from the central drainage of the facility,
- 5) Inspecting, maintaining and repairing the structures at the facility, including the landfill, both on a routine basis and after extreme natural occurrences, and;
- 6) Providing a financial mechanism to fund the above post-closure activities throughout the entire post-closure period.

**Name of Public Agency Approving Project:** Department of Toxic Substances Control  
Land Disposal Branch

**Name of Person or Agency Carrying Out Project:** IT Corporation

**Exempt Status:** Title 14, California Code of Regulations, section 15061(b) (3)  
With certainty, no possibility of a significant effect on the environment.

### **Reasons Why Project is Exempt:**

1. An EIR was prepared and certified in 1998 in support of the Closure and Post-Closure Plans. The recent inspections have revealed no failures or malfunctions in the landfill units described below.
2. The Closure Certification Report as approved by an independent registered engineer certified that the IT Panoche HWMF closure requirements were implemented and constructed according to the approved plans and is in good working order. These units include; (1) the landfill subgrade, (2) the landfill cover, (3) the drainage trenches, and (4) the final site topography.
3. The leachate collection, removal and treatment system was built according to the approved plans and is in good working order. This system consists of collection pipes, sumps, pumps and riser pipes, pumping systems, and the leachate treatment system. In addition, the cover has a gas collection system with the following features: gas collection pipes, riser pipes and gas carbon filter assemblies.
4. For the purposes of groundwater monitoring, DTSC has approved the Groundwater and Drum Burial Area V Sampling and Analysis Plan (SAP) to adequately monitor the site hydrogeology. Major features of the SAP include: a list of Constituents of Concern, Concentration Limits, Monitoring Points, and a Reporting Program.

5. There is a groundwater control system at the facility designed to create an inward gradient of the groundwater level within the slurry wall downgradient of the central drainage area of the closed facility. This is achieved by the extraction of groundwater from the area within the slurry walls for treatment. The groundwater control system will continue to operate until such time that DTSC has determined that corrective action is no longer necessary.
6. The post-closure permit includes provisions to restrict future land uses. Any future use proposals will require both land use decisions by Solano County and evaluation of existing conditions at the HWMF site by DTSC. New use of the site will also require an amendment of the post-closure permit, pursuant to the specific conditions stated therein. Deed restrictions are also in place that limit future use of the property and provide notice of its former hazardous waste landfill uses.
7. There is an interim corrective action remediation system that has been operating at DBA V since 1997. The existing system is being expanded to include additional extraction wells, a deep source area control trench, and a soil vapor extraction system as described in the 2000 Final Corrective Action Remedy Selection. A Supplemental Negative Declaration was prepared in 2000 for this decision. This remedy selection included a design for remediating DBA V groundwater and soil contamination and was approved under a separate Corrective Action Consent Agreement. The expanded system will be completed in 2003.

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**Signature:** NOT SIGNED - DRAFT  
James M Pappas, P.E.  
Chief, Land Disposal Branch

**Date:** \_\_\_\_\_